

April 25, 2012 Conference with EPA, Region 10 to Discuss Unilateral Administrative Order (UAO) Issued to Potlatch on April 12, 2012 (Docket No. CERCLA 10-2012-0120)

A G E N D A

I. Introductions

II. Major Issues.

A. Potlatch does not think the remediation can be completed in 2012 based on EPA's Work Plan. We think EPA and its Contractor agree with this conclusion. This affects various provisions in the UAO and the Statement of Work.

1. Possible Resolution: EPA and Potlatch conduct remediation at the same time or amend UAO to reflect 2013 completion.

B. Remediation of IDL Property. The UAO is unclear as to which IDL property Potlatch is required to remediate. We understand EPA intends to remediate the IDL property adjacent to the Bencik property and expects Potlatch to remediate the IDL property adjacent to Potlatch's property.

1. Resolution: Clarify UAO on this point.

a. Related Issue: If Potlatch cannot begin remediation until after EPA completes its work, less impacts to the River will likely occur if remediation of all IDL property is done in one season.

2. Resolution: EPA remediates all of IDL's property at the same time including that portion adjacent to Potlatch's property. We can discuss how to address reimbursement to EPA for this portion of the work under the UAO.

C. Assuming Potlatch cannot commence remediation until after EPA completes remediation, the schedule to submit Plans can be extended in the UAO.

1. Resolution: Even though Potlatch is prepared to comply with the current deadlines in the UAO, we believe EPA should revise the UAO so that Potlatch has more time to submit the Work Plan and related plans. This will afford Potlatch the ability to actually observe EPA in the field, see EPA's construction drawings on remediation at property boundaries and better understand EPA's schedule to complete its work. We believe delay in the submission of plans will ultimately result in a more effective Work Plan to carry out the intent of the UAO.

III. Clarifications in the UAO

- Statement of Facts
- Weekly Reports
- Submission of Data
- Primary Contractor and Replacement of Contractor

IV. Clarifications in the Statement of Work

- Commencement of Work by Potlatch
- Timing of Schedule of Work by Potlatch
- Identification of all Subcontractors